

APR 19 2019

MEMORANDUM

SUBJECT: Phase II ESA Work Plan Former Clinton Engines Vapor Intrusion at Museum;
Maquoketa, Iowa – Approved with Condition

FROM: Diane Harris
Regional Quality Assurance Manager
ENST/IO

TO: Jennifer Morris, Project Manager
Brownfields and Land Revitalization Branch
Superfund Division

The review of the subject document prepared by Impact7G and dated 08/23/2018 has been completed according to "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001. This document is a Phase II Work Plan to the previously approved *Phase I and Phase II Environmental Site Assessments DQOs and Generic Quality Assurance Project Plan- ECIA* (R7QAO Document Number: 2017112).

Based on the comments below, the document is approved with condition. The document was found to be incomplete in addressing some key areas to the extent of potentially jeopardizing the quality of the data. These areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues. General comments identify opportunities for strengthening the document but do not affect approval.

Critical Comments

1. § VI. Property-Specific Sampling Design(s), page 3.
 - a. Although assumptions can be made, the reason(s) for choosing the community meeting room, the media room, the eastern part of the building, and the western part of the building as the locations for the four indoor air samples needs to be included in the QAPP or a reference provided as to where this information can be found (e.g., Attachment 4, if applicable).
 - b. Will the sampling results be compared to any action level or other standard to determine the level of human health risk and if vapor intrusion is occurring or is simply presence/absence at the achievable detection limits of interest?
2. § XII. General Soil-Gas, Indoor Air, and Outdoor Air Inspection Procedure, page 4. This section states the canisters will be opened for sample collection in the basement and outside the building

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over a 24-hour period. However, the two upstairs locations in the building do not appear to be addressed here. Although it is assumed they will be collected over the same time period, this does need to be confirmed and documented in this Work Plan.

General Comments

3. § XII. General Soil-Gas, Indoor Air, and Outdoor Air Inspection Procedure, page 4. It appears the laboratory to perform the analysis has not yet been selected.
 - a. Please note any laboratory references, including the capability to perform the chosen method at the needed sensitivity, could not be verified at the time of the review. Once the laboratory has been selected, this needs to be confirmed before analysis.
 - b. Although the base method TO-15 is identified, typically a laboratory will have an SOP or similar procedure describing their specific implementation of the based method and it would be helpful to reference any such SOP or written procedure once the laboratory has been selected.

If you have any questions, please contact me at x7258.

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